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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

**IN RE: KIM ZIEGELMAYER
Debtor**

**Chapter 7
BK No: 17-11357
A.P. No. 19-01020**

**CHARLES A. PISATURO, JR. TRUSTEE
Plaintiff**

v.

**SUNFLOWER REAL ESTATE, LLC;
KIM ZIEGELMAYER, AND LINDA L. GLYNN
Defendants**

MOTION TO EXTEND TIME TO FILE ANSWER

The undersigned needs additional time to meet with his client to discuss the allegations contained in Linda Glynn's Cross-Claim so that appropriate answer to the pleadings can be filed. The undersigned requests that the deadline to file an answer or responsive pleading to the above Cross-Claim be extended for an additional 15 days. The granting of the instant request will not be prejudicial to any party in interest.

WHEREFORE, the undersigned on behalf of Kim Ziegelmayr prays that her motion be granted and that the Court extend the deadline to file an answer to Linda Glynn's cross-claim through October 15, 2019.

**Kim Ziegelmayr,
By her attorney**

/s/Christopher M. Lefebvre#4019
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Within fourteen (14) days after service, if served electronically, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail or other excepted means specified, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATION OF SERVICE

I hereby certify that on September 30, 2019, I electronically filed a Motion to Extend Time to file answer to Linda Glynn's Cross-Claim Against Kim Ziegelmayr with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System.

The following participants have received notice electronically: Office of the U.S. Trustee, Peter J. Furness, Esq., Stacy B. Ferrara, Esq. and Charles A. Pisaturo, Jr., Esq.; and I hereby certify that I have mailed by United States Postal Service, postage pre-paid, the document and a copy of the Notice of Electronic Filing to the following non CM/ECF participants:

/s/Maria J. Ferreira